

HARRIS

ST. LAURENT

WECHSLER

January 24, 2023

BY ECF

The Honorable Judge Loretta A. Preska
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Ishan Wahi, et al., 22 Cr. 392 (LAP)

Dear Judge Preska,

We represent Ishan Wahi in the above-referenced matter. We write to respectfully request Court approval of a change in the conditions of release to allow defendant Ishan Wahi to move from his current residence in Seattle, Washington to Houston, Texas, and, later, to Austin, Texas. The government has no objection to this request.

As part of the conditions of release that the Court set for Ishan Wahi on August 3, 2022, his travel was restricted to the Western District of Washington and the Southern and Eastern Districts of New York. Consistent with those conditions of release, and under the supervision of pretrial services, Ishan Wahi has been living in Seattle, Washington with his brother, and co-defendant, Nikhil Wahi. Mr. Wahi has complied with all the terms of his conditions of release to date.

As I previously informed the Court (Docket Entry 51), Ishan Wahi traveled to Texas to explore potential places to live after Nikhil Wahi's sentence. Now, with Nikhil Wahi having been sentenced by the Court and his surrender date of February 6, 2023 approaching, Ishan Wahi needs to find a new place to live. Ishan Wahi expects that, after the move, he would first live for a month or two with his girlfriend in Houston, Texas, and then move in with his uncle in Austin, Texas. He has fully informed pretrial services of his intention to make this move.

Our understanding from pretrial services is that the only action required by the Court to allow for this move is for the Court to modify the conditions of release to allow Ishan Wahi to be present in the Southern District of Texas (Houston) and Western District of Texas (Austin). This would also, coincidentally, facilitate Ishan Wahi's ability to visit his brother should Nikhil Wahi be designated to FCI-Bastrop, as Nikhil Wahi has requested.

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Accordingly, we respectfully request that the Court modify Ishan Wahi's conditions of release to allow him to be present in the Southern District of Texas and the Western District of Texas. As noted above, the government does not object to this request.

We are available at the Court's convenience to discuss any matter relating to this request.

Respectfully,

A handwritten signature in dark ink, appearing to read "Andrew St. Laurent".

Andrew St. Laurent

cc: AUSA Noah Solowiejczyk, Esq. (by ECF)
AUSA Nicolas Roos, Esq. (by ECF)
David Miller, Esq. (by ECF)